UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

_____X WTC CAPTIVE INSURANCE COMPANY, INC., :

Civil Action No.: 07 Civ. 1209

Plaintiff,

District Judge Alvin K. Hellerstein

Magistrate Judge Theodore H. Katz

v.

LIBERTY MUTUAL FIRE INSURANCE COMPANY: CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, AND CERTAIN LONDON: MARKET INSURANCE COMPANIES; ASSICURAZIONI GENERALI S.P.A.; and GENERAL SECURITY INDEMNITY COMPANY OF ARIZONA, as attorney in fact for : and successor in interest to GENERAL SECURITY: INDEMNITY COMPANY (now known as **HUDSON SPECIALTY INSURANCE** COMPANY),

NOTICE OF MOTION TO TO ADDRESS THE COURT'S SUBJECT MATTER JURISDICTION

ECF CASE

Defendants.

PLEASE TAKE NOTICE that upon the accompanying Declaration of Sally Dunning

dated November 21, 2007; Declaration of Maxine Hilary Verne dated November 27, 2007; Declaration of Larry P. Schiffer dated November 26, 2007; Memorandum of Law of Defendants Certain Underwriters at Lloyd's, London, Certain London Market Insurance Companies, Assicurazioni Generali S.p.A., and General Security Indemnity Company of Arizona (collectively, the "Excess Insurers"); and all prior papers and proceedings, the Excess Insurers. by their counsel, Dewey & LeBoeuf LLP, will move this Court before the Honorable Alvin K. Hellerstein in Room 14D in the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for an order determining whether the Court has subject matter jurisdiction over this action.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's Local Civil Rule 6.1(b), answering papers, if any, are to be served upon the undersigned on or before

December 11, 2007.

Dated: New York, New York

November 27, 2007

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